III.   REMARKS

Claims 1-22 remain pending, and are rejected under 35 USC 103(a) as allegedly being unpatentable over Tyburski in view of Ott et al., US Patent 5,754,674 ("Ott") and Cain (U.S. 4,523,33). Applicant has herein amended claim 20 to address the 35 USC 101 rejections. No new matter is believed added.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

I. Lack of motivation to combine the references as suggested and failure to teach or suggest each of the claim features

Applicant traverses the rejections of independent claims 1, 8, 16 and 20 because one skilled in the art would not be motivated to combine the references as suggested. Namely, as noted in the Office Action, Tyburski fails to teach or suggest positionally synchronizing a string of characters *in which at least one set of transduced character information includes a string of characters having a missing or erroneously added character*. To overcome this deficiency, Cain is relied upon as teaching "missing characters or numbers in a MICR read." However, the context in which this arises and how it is addressed in Cain has nothing to do with synchronizing characters. Instead, Cain teaches that when a read results in a missing character, the image and associated data is pulled from a disc file 122 and is displayed on an IDT (image display terminal). The operator must then view the image and manually enter the missing data via a keyboard (KB) 144. The data is then restored to the disc file 122. This process is described in

detail in column 8 with respect to missing courtesy amounts. Cain further states that a similar process is used to complete MICR data. (See column 8, lines 65-67). As such, Cain provides a solution for replacing missing characters in a data set obtained from a document image using a manual process, while the present invention provides a solution for positionally synchronizing a string of characters when a character is missing or an extra one is added. As such, one skilled in the art would find no motivation whatsoever from Cain to modify Tyburski as proposed in order to provide positional synchronization of characters *in which at least one set of transduced character information includes a string of characters having a missing or erroneously added character.*

As noted, unlike the present invention in which positional synchronization is provided to address missing character data, Cain teaches a process in which an operator must manually edit data retrieved from storage. Accordingly, even if the references were combined as suggested, the resulting combination would require manual intervention to insert missing characters in a set of character data. As such, the combination fails to teach or suggest each of the claim limitations. For these reasons, Applicant submits that each of the independent claims is not obvious in view of the cited combination.

II. Ott fails to teach the features recited in dependent claims 4, 5, 12, 13, 17, 18 and 21

In the Office Action, it is alleged that Ott teaches storing X-Y positional character data, and with respect to claim 4, teaches "wherein each position / X-Y coordinate measurement provides a distance from the character to a predetermined location on a document." Applicant respectfully traverses this finding. While Ott does teach locating image fields based on an X-Y coordinate, the position of each such image field is not based on a distance from the image field

to a predetermined location on the *document*. Instead, the X-Y coordinates are based on pixel locations of where an image field falls within the entire *image space*. For instance, consider a JPEG image having an image space in which a check is displayed. Because documents come in different sizes, the check would typically not fill the entire image space, but would be surrounded by an empty border. In Ott, the X-Y coordinates of an image field are determined based on a pixel location of the image field relative to the entire image space. Thus, in Ott, if the check is shifted or skewed within the JPEG image, the X-Y coordinates of the image field change. Conversely, claim 4 (and similarly 12, 17 and 21) recites wherein the position measurement is based on a distance from the character to a *predetermined location on the document*. Thus, a relative distance is provided in claim 4 that does not change even if the document shifts or is skewed within the image space.

This distinction is noteworthy in the context of the present invention in that the placement of the document in the image space may vary from transducer to transducer. Accordingly, if the position measurements were determined based on pixel coordinates (as taught by Ott), the position of a given character may not be consistent among different transducers, and the described synchronization process would be prone to errors. Thus, the relative location of the characters within the document itself is very important for positional synchronization. Conversely, the purpose of Ott is to analyze different image fields with a check image to determine if the check image is acceptable (see, e.g., Abstract). As such, the relative position of the image fields within the document itself is not important for Ott.

Accordingly, Applicant submits that Ott fails to teach the features recited in claim 4, namely, wherein the position collection system generates a position measurement for each character in the at least one set of transduced character information, wherein each position

measurement provides *a distance from the character to a predetermined location on a document* containing the printed character data. Claim 5 (and similarly claims 13 and 18) further expands on this by reciting that the predetermined location is an edge of the document. Nowhere does Ott teach such a feature.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

/ Michael Hoffman /

Michael F. Hoffman
Reg. No. 40,019

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Hoffman, Warnick & D'Alessandro LLC
75 State Street
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile